

# Federal Defenders OF NEW YORK, INC.

Southern District  
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*David E. Patton*  
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*Southern District of New York*  
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May 21, 2020

**VIA ECF**

The Honorable Raymond J. Dearie  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: United States v. Cambria Merrill  
19 Cr. 695 (RJD)

Application Granted.

Case adjourned to 8/7/2020 at 10:00am before  
the undersigned.

With the consent of parties, the time period from  
5/29/2020 to 8/7/2020 is excluded under the  
Speedy Trial Act pursuant to  
18 USC 3161(h)(7)(A), in the interest of justice.  
So Ordered.

5/22/2020

/S/ Raymond J. Dearie

Dear Judge Dearie:

The defense writes with the consent of the Government to adjourn the pretrial conference currently scheduled for Friday, May 29, 2020 for at least 30 days due to the ongoing pandemic and to allow the defense and Government to continue negotiating a disposition. The defense consents to waiving Speedy Trial time until the next conference date.

Additionally, Ms. Merrill was injured at her workplace—she works in a FedEx warehouse. She needs an MRI that will require her ankle monitor to be temporarily removed. The defense respectfully requests that the Court allow its removal for this procedure. Ms. Merrill will coordinate with her Pretrial Officer on the removal and reinstallation of the device. The Government and Pretrial consent to this request.

Thank you for your consideration of this matter.

Respectfully submitted,

*Ian Marcus Amelkin*  
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/s/  
Ian Marcus Amelkin  
Assistant Federal Defender  
(212) 417-8733

cc: AUSA Peter J. Davis (by ECF)